

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Court File No.: 27-CR-20-12646

State of Minnesota,

Plaintiff,

**STATE'S MOTION FOR  
PROTECTIVE ORDER**

v.

Derek Michael Chauvin,

Defendant.

TO: The Honorable Peter Cahill, Judge of District Court, and counsel for Defendant, Eric J. Nelson, Halberg Criminal Defense, 7900 Xerxes Avenue South, Suite 1700, Bloomington, MN 55431.

The State hereby moves the Court for a protective order pursuant to Minn. R. Crim. P. 9.03, subd. 5. In an Order dated March 1, 2021, the federal district court authorized the release of certain investigative materials from the federal investigation of this matter to the Minnesota Attorney General's Office. The Order states that the Minnesota Attorney General's Office must "seek a protective order or agreement limiting disclosure of these . . . materials to only those persons who need access to them in order to prepare for trial, and limiting those persons with access from using the . . . materials for any purpose other than preparing for trial." The Order also provides that "any such protective order or agreement should ensure that any . . . materials disclosed pursuant to this Order and filed in state or federal court be filed under seal." Finally, the Order states that in seeking the protective order, the Minnesota Attorney General's Office shall file the federal court Order under seal. Accordingly, the federal court Order is filed herewith under seal pursuant to Rule 4, subd. 1(v)(3) of the Rules of Public Access to Records of the Judicial Branch. The State

respectfully requests that the Court issue a protective order in accord with the provisions of the federal court Order.

Dated: March 5, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Matthew Frank  
MATTHEW FRANK  
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